

**REMARKS**

Claims 1-5, 7-9, 11-24, 26-29, 31, 34-37, and 39 are pending and stand rejected. In view of the following remarks, the Applicant respectfully requests that the Examiner reconsider and pass the application on to issuance.

Rejecting the Claims, the Examiner cites US Pub 2001-0013947 to Van Der Linden. In various portions of the present office action the Examiner states that Van Der Linden teaches "adding a new printer to a pull-down menu for selecting the printer, as a result of the addition of a new printer capable of printing documents on transparent media." The Applicant assumes that this is not an intentional misstatement as Van Der Linden does NOT teach adding a new printer to a pull down menu. Van Der Linden describes adding an option to a pull down menu – the option relating to a service provided by a newly added printer.

To further illustrate the misstatement, the relevant passage from Van Der Linden is reproduced as follows:

[0051] Since the submission form must only include the options that are available in the reproduction center, the submission form description 57 can be edited from the operator console 58 in case that the hardware equipment and hence the capabilities of the reproduction center should change. If, for example, a new printer is installed which is capable of printing on transparent overhead projector film, then the option "transparent" may be added to the pull-down menu 30 "paper", as shown in FIG. 3. Thus, the clients are always kept up to date with relation to the capabilities of the reproduction center, without any need for updating the software installed on the client computers.

Van Der Linden, paragraph [0051] (emphasis added).

The Applicant's respectfully ask that the Examiner correct this mistake.

**CLAIM REJECTIONS – 35 USC §102:** The Examiner rejected Claims 19-23, 26-29, 31, 34, 26-37, and 39 as being anticipated by Van Der Linden.

Van Der Linden is directed to a method for electronically submitting documents to a reproduction center. Van Der Linden, Abstract. To that end a printer driver (16) is

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provided to generate a "temporary print file." Van Der Linden, [0038], [0039]. A "repro printer demon" (20) then causes the temporary print file to be transmitted to the reproduction center. Van Der Linden, [0040]. The reproduction center sends back a submission form (40). Van Der Linden, [0041]. The submission form (40) includes menus that allow a user to provide personal information and to select previously specified print options. Van Der Linden, [0042].

The submission form (40) includes a button (34) to submit personal information and selected print options to the reproduction center. Van Der Linden, [0045]. The submitted information is referred to as a job ticket and is associated with the temporary print file. Van Der Linden, [0052]. An operator at the reproduction center, using a software tool, then manually schedules a print job for the print file according to the corresponding job ticket. Van Der Linden, [0055]. The software tool presents the operator with an interface that lists selected print options so the operator can manually identify and assign the print job to a "print engine" that has the necessary capabilities. Van Der Linden, [0056].

**Claim 19** is directed to system for managing production requests and, as amended, recites the following elements:

1. a production client operable to receive a production request, the client comprising:
  - a. a capture driver operable to capture the production request; and
  - b. an interface translator operable to present first and second user interfaces, the first user interface having user accessible controls for selecting services for producing the production request, and the second user interface having user accessible controls for selecting one or more, if any, production devices identified as being capable of providing services selected through the first user interface;
2. a production server in electronic communication with the production client and operable to direct one or more selected document production devices to produce

the captured production request with selected services, the production server comprising:

- a. a services engine operable to provide the production client with the first user interface, to receive service selections made through the first user interface, to automatically identify the one or more, if any, production devices capable of providing the service selection, to generate and provide the second user interface to the production client, and to receive selections made through the second user interface; and
- b. a production engine operable to deliver the captured production request to a production device or devices selected through the second user interface

Claim 19 recites a system that utilizes a production client that presents two user interfaces. The first is for selecting services and the second is for selecting production devices identified as being capable of providing services selected through the first user interface. The system also utilizes a production server that provides the production client with the first and second user interfaces. More specifically, the production server, after providing the first interface, receives selections made through the first interface to then automatically identify production devices to include in the second user interface. In other words, the system recited in Claim 19 automatically generates a second user interface that identifies production devices that are capable of providing the specific services selected by a user through the first interface.

The Examiner asserts that Van Der Linden, paragraphs [0016], [0041], [0051], [0059], and Fig. 3 teach "second user interface having user accessible controls for selecting one or more, if any, document production devices identified as being capable of providing services selected through the first user interface."

Fig. 3 illustrates a "submission form" user interface for selecting print options. It is noted that the user interface illustrated in Van Der Linden, Fig. 3 does NOT include any controls for selecting a production device let alone a production device identified as being capable of providing services selected through the first user interface."

Paragraph [0016] describes that "process steps" are performed "on the side of the reproduction center" are performed by a "print server." This print server is NOT a production client as it does not present the first and second user interfaces recited by Claim 19. The print server is simply responsible for sending a submission form to be displayed on a remote user's screen. Granted, the contents of the submission form are dependent upon the functionality available at the reproduction center. However, this simply means that Van Der Linden's submission form only includes controls for selecting services that are available at Van Der Linden's reproduction center.

Paragraph [0041] simply describes that as the reproduction center receives a printer language document from the remote user, the reproduction center sends the remote user a web page for displaying the submission form.

Paragraph [0051] describes that Van Der Lindens submission form MUST only include options available at the reproduction center. At the reproduction center, the "submission form description" can be manually edited from an "operator console" to reflect any changes of the capabilities of the reproduction center. The "submission form description" is simply an HTML file defining a web page for displaying the submission form. It is this HTML file that the reproduction center sends tot eh remote user.

Paragraph [0059] describes the reproduction center s including a "device capabilities store" that can be manually updated via Van Der Linden's operator console. The device capabilities store is a database containing the capabilities of all printers at the reproduction center. Using the device capabilities store, the submission form description describe in paragraph [0051] can be updated.

Nowhere in the passages cited by the Examiner does Van Der Linden teach or suggest providing a remote user with an interface having controls for selecting a production device. Moreover, the passages are absolutely silent as to presenting a user interface "having user accessible controls for selecting one or more, if any, production devices identified as being capable of providing services selected through the first user interface" as specifically recited in Claim 19.

Van Der Linden TEACHES AWAY from the claimed invention by requiring a reproduction center operator or a "scheduler" at the reproduction center to identify and select a capable printer. See Van Der Linden, [0055] and [0060]. Claim 19 recites a system in which a user who submitted the production request ultimately selects the specific production device that will produce the production request.

For at least these reasons Claim 19 and Claims 20-24 and 26-28, which depend from Claim 19, are clearly patentable over Van Der Linden.

Claim 29 is directed to a distributed document production system that includes a services engine and a production engine operating on one or more computing devices that are remote from a production client. The services engine is operable:

- to obtain a selection of one or more services for producing a production request captured by the production client;
- to automatically identify one or more, if any, production devices capable of providing the selected services; and
- to obtain a selection of one or more of the identified production devices from the production client.

The production engine is operable to deliver the captured production request to a selected production device.

Rejecting Claim 29, the Examiner mistakenly relies on Van Der Linden, [0038]-[0043] and Fig. 3. As noted above, Fig. 3 illustrates a submission form and does NOT include any controls for selecting a production device let alone a production device identified as being capable of providing the selected services.

To further illustrate the Examiner's mistake, the cited passage ([0038]-[0043]) is reproduced as follows:

[0038] The software components shown in FIG. 1 include a specific printer driver 16 which, however, is not associated with a print engine in the periphery of the client computer, but has been provided by the reproduction center. This printer driver 16 uses a standard printer description such as, for example, PPD (Postscript Printer Description). This printer description is used only for standardizing data traffic with the

reproduction center and does not necessarily correspond to a physical print engine in the reproduction center.

[0039] When the end user wants to submit a print job to the reproduction center, i.e. he wants to have printed a document created with the desktop application 14, he simply uses the print function of the desktop application to activate the printer driver 16. Just as in a normal printing process, this has the effect that a temporary print file is generated in a format (i.e., a printer language) such as Postscript. This print file is shown in FIG. 1 and is termed printer language document 18.

[0040] The occurrence of the printer language document 18 in the memory of the computer 10 activates a program module (i.e., a daemon) called repro printer daemon 20. This repro printer daemon, which has also been provided by the reproduction center, gets control over the telecommunications software which in the case of windows NT .RTM. forms part of the operating system software package. Within this telecommunications software, a module 22 called FTP client establishes a network connection with the specified address of the reproduction center and sends the printer language document 18 to the reproduction center in accordance with a standard transmission protocol such as FTP (File Transfer Protocol).

[0041] Concurrently with the transmission of the printer language document, the reproduction center sends back a piece of program code which is written for example in HTML (Hypertext Markup Language). This piece of program code, which is called a submission form description, is interpreted by the telecommunications software (e.g. web browser). As a result, a corresponding submission form 24 is displayed on the monitor screen of the client computer. This submission form 24, which may have the appearance shown in FIG. 3, allows the end user to interact with the reproduction center by entering information and commands into the submission form.

[0042] As is shown in FIG. 3, the submission form 24 has a number of fields 26 allowing the user to type-in the required personal data and, as the case may be, a password authorizing him as a customer. The submission form further includes a number of pull-down menus 28, 30 allowing the user to select among various print options that have been specified beforehand on the side of the reproduction center in accordance with the capabilities of the print engines available there. In the example shown, the pull-down menu 30 "paper" is active and shows the available paper qualities. For the other pull-down menus 28, the respective default values are shown.

[0043] The submission form 24 is also capable of dealing with mutual dependencies of the available print options. If, for example, the reproduction center has a full color printer for printing A4 documents and a black/white printer for printing A4 and A3 documents, then the pull-down

menu 28 for the paper format will show both options A4 and A3 as long as the option "black/white" is selected for "color". However, as soon as the user selects the color option "full color", the format option A3 will disappear or will be marked as not available in any other way. Thus, the submission form 24 makes sure that the end user can only select a combination of options that can actually be fulfilled on the side of the reproduction center.

Nothing in this passage even remotely hints of a services engine and a production engine that operate on one or more computing devices that are remote from a production client in the particular manner recited by Claim 29. More specifically, the passage mentions nothing of a services engine that is operable to automatically identify one or more, if any, production devices capable of providing services selected via the remote production client. Further the passage mentions nothing of a services engine that is operable to obtain a selection of one or more of the identified production devices from the remote production client.

For at least these reasons, Claim 29 is clearly patentable over Van Der Linden as are Claims 31, 34-37, and 39 which depend from Claim 29.

**CLAIM REJECTIONS – 35 USC §103:** The Examiner rejected Claims 1-5, 7-9, 11-18, 24, and 35 under §103 as being unpatentable over Van Der Linden.

**Claim 1** is directed to a method for managing electronic document production over a computer network and recites the following acts:

- presenting, to a remote computing device, a first user interface with user accessible controls for selecting services for producing a production request captured on the remote computing device;
- presenting, to the remote computing device, a second user interface having user accessible controls for selecting one or more, if any, document production devices identified as being capable of providing services selected through the first user interface;

- merging the selected services and the captured production request into a production plan; and
- delivering the production plan in a device specific format to one or more selected document production devices selected through the second user interface.

Claim 1 recites a method that utilizes two user interfaces. The first is for selecting services. The second is for selecting production devices identified as being capable of providing services selected through the first user interface. For the reasons stated above, Van Der Linden clearly does not teach or suggest this second interface. For at least those reasons, Claim 1 is clearly patentable over Van Der Linden as are Claims 2-5, 7, and 8 which depend from Claim 1.

Claim 9 is directed to a computer program product for managing electronic document production over a computer network. The product comprising a computer useable medium having computer readable instructions for performing the method of Claim 1. For the same reasons Claim 1 is patentable, so are Claim 9 and Claims 11-18 which depend from Claim 9. Claim 10 has been cancelled.

Claim 24 distinguishes over Van Der Linden based at least on its dependency from Claim 19.

Claim 35 distinguishes over Van Der Linden based at least on its dependency from Claim 29.



**CONCLUSION:** The foregoing is believed to be a complete response to the outstanding Office Action. Claims 1-5, 7-9, 11-24, 26-29, 31, 34-37, and 39 are all felt to be in condition for allowance. Consequently, early and favorable action allowing these claims and passing the application to issue is earnestly solicited. The foregoing is believed to be a complete response to the outstanding Office Action.

Respectfully submitted,  
Rogelio Robles, et al.

By 

Jack H. McKinney

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